

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

CAROLYN DYKES, on behalf of herself and all)	Civil Action No.
others similarly situated,)	1:17-cv-01111 (AJT/JFA)
)	CLASS ACTION
Plaintiff,)	
v.)	
)	
VAN RU CREDIT CORPORATION,)	
)	
Defendant.)	

**PROPOSED DISCOVERY PLAN
PURSUANT TO RULE 26(f)**

Pursuant to the Court's Order dated December 19, 2017, and Federal Rule of Civil Procedure 26(f), the parties submit their joint discovery plan as follows:

1. Each party shall make the initial disclosures pursuant to Rule 26(a)(1) within fourteen (14) days after the pretrial conference.
2. The parties will work together on an appropriate protective order to submit to the Court which will meet the requirements of Local Rule 5.
3. All pleadings, motions, and other papers are to be served on the other parties electronically as provided by Fed. R. Civ. P. 5(b)(2)(E), 6(d), the Local Rules, and the Local ECF Policies and Procedures. The parties agree to serve by e-mail all discovery requests, objections, and written responses and any other papers that are not filed. The serving party shall attach the pleading or other paper in "Portable Document Format" ("pdf") or other form of electronic file; if transmission of voluminous materials (such as a compendium of attachments or transcripts) as an e-mail attachment is impractical, then those materials shall be served by overnight delivery via a service with the ability to "track" deliveries and verify receipt. Service by e-mail prior to 6:00 p.m., Eastern Time shall be the equivalent of

service by hand that day for purposes of Fed. R. Civ. P. 5 and 6. If service by overnight courier has been used for any papers, it will be the equivalent of service by hand on the day of receipt.

4. Plaintiff shall serve his expert disclosures and reports upon Defendant on February 19, 2018.
5. Defendant shall serve their expert disclosures and reports upon Plaintiff on March 19, 2018.
6. Plaintiff shall serve his rebuttal expert disclosures and reports upon Defendant on or before April 14, 2018.
7. All discovery shall be completed by May 11, 2018. The parties do not believe that discovery should be conducted in phases or be focused on particular issues.
8. The parties shall exchange copies of exhibits and witness lists on or before May 17, 2018, prior to the final pretrial conference.
9. The Final Pretrial Conference will be held on May 17, 2018 at 10:00 a.m. The items that the parties are required to bring to the Final Pretrial Conference are recited in the Court's Order dated December 19, 2017.
10. The parties do not consent to the magistrate judge jurisdiction.
11. Any amendments to the original pleadings shall be made no later than January 30, 2018. Any subsequent amendments to the pleadings must be made with leave of court or the agreement of the parties.
12. The parties have discussed settlement, and continue to engage in settlement discussions. If appropriate and required, the parties are willing to discuss the feasibility of a settlement conference through the court.

13. Any document which is stored electronically may be produced electronically in “Portable Document Format” (“.pdf”) or other form of electronic file.
14. If any privileged document is inadvertently produced, the privilege is not waived. The party who is claiming the privilege must notify the other party of the claimed privilege. If there is no disagreement regarding the claimed privilege, the receiving party will destroy the privileged document. If there is a disagreement regarding the claimed privilege, the receiving party will segregate the document, and the parties will submit the document under seal to the Court. The party claiming the privilege must file a memorandum supporting the claim within 5 days of the document being submitted under seal to the Court, and the opposing party must submit a response memorandum within 5 days thereafter. The court may decide the issue on the papers, unless either party specifically requests a hearing on the issue.

Respectfully submitted,

_____/s/_____
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